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7  
8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 v.  
14 APPROXIMATELY \$59,620.00 IN U.S.  
CURRENCY,  
15 Defendant.  
16

2:20-MC-00146-TLN-KJN

STIPULATION AND ORDER EXTENDING TIME  
FOR FILING A COMPLAINT FOR FORFEITURE  
AND/OR TO OBTAIN AN INDICTMENT  
ALLEGING FORFEITURE

17 It is hereby stipulated by and between the United States of America and potential claimant Trey  
18 Suy Lay ("Lay"), by and through their respective counsel, as follows:

19 1. On or about March 23, 2020, claimant Lay filed a claim in the administrative forfeiture  
20 proceedings with the Drug Enforcement Administration with respect to the Approximately \$59,620.00  
21 in U.S. Currency (hereafter "defendant currency"), which was seized on January 17, 2020.

22 2. The Drug Enforcement Administration has sent the written notice of intent to forfeit  
23 required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person  
24 to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than  
25 the claimant has filed a claim to the defendant currency as required by law in the administrative forfeiture  
26 proceeding.

27 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for  
28 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant

1 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative  
2 forfeiture proceedings, unless the court extends the deadline for good cause shown or by agreement of  
3 the parties. That deadline was June 19, 2020.

4 4. By Stipulation and Order filed June 15, 2020, the parties stipulated to extend to August  
5 18, 2020, the time in which the United States is required to file a civil complaint for forfeiture against the  
6 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
7 forfeiture.

8 5. By Stipulation and Order filed August 17, 2020, the parties stipulated to extend to October  
9 19, 2020, the time in which the United States is required to file a civil complaint for forfeiture against the  
10 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
11 forfeiture.

12 6. By Stipulation and Order filed October 15, 2020, the parties stipulated to extend to  
13 December 18, 2020, the time in which the United States is required to file a civil complaint for forfeiture  
14 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
15 subject to forfeiture.

16 7. By Stipulation and Order filed December 16, 2020, the parties stipulated to extend to  
17 February 16, 2021, the time in which the United States is required to file a civil complaint for forfeiture  
18 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
19 subject to forfeiture.

20 8. By Stipulation and Order filed February 16, 2021, the parties stipulated to extend to April  
21 16, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the  
22 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
23 forfeiture.

24 9. By Stipulation and Order filed April 16, 2021, the parties stipulated to extend to June 15,  
25 2021, the time in which the United States is required to file a civil complaint for forfeiture against the  
26 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
27 forfeiture.

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1           10. By Stipulation and Order filed June 14, 2021, the parties stipulated to extend to August  
2 13, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the  
3 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
4 forfeiture.

5           11. By Stipulation and Order filed August 10, 2021, the parties stipulated to extend to  
6 September 13, 2021, the time in which the United States is required to file a civil complaint for forfeiture  
7 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
8 subject to forfeiture.

9           12. By Stipulation and Order filed September 13, 2021, the parties stipulated to extend to  
10 October 13, 2021, the time in which the United States is required to file a civil complaint for forfeiture  
11 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
12 subject to forfeiture.

13           13. By Stipulation and Order filed October 13, 2021, the parties stipulated to extend to  
14 November 12, 2021, the time in which the United States is required to file a civil complaint for forfeiture  
15 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
16 subject to forfeiture.

17           14. By Stipulation and Order filed November 12, 2021, the parties stipulated to extend to  
18 December 13, 2021, the time in which the United States is required to file a civil complaint for forfeiture  
19 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
20 subject to forfeiture.

21           15. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend  
22 to January 12, 2022, the time in which the United States is required to file a civil complaint for forfeiture  
23 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
24 subject to forfeiture.

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1           16.     Accordingly, the parties agree that the deadline by which the United States shall be  
2 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment  
3 alleging that the defendant currency is subject to forfeiture shall be extended to January 12, 2022.

4     Dated:     12/13/21

PHILLIP A. TALBERT  
Acting United States Attorney

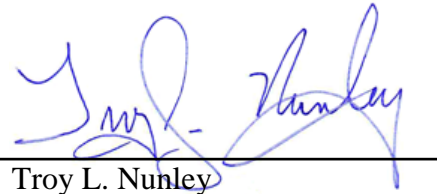
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6                     /s/ Kevin C. Khasigian  
7 KEVIN C. KHASIGIAN  
Assistant United States Attorney

8  
9     Dated:     12/13/21

/s/ Isaac Safier  
ISAAC SAFIER  
Attorney for Trey Suy Lay  
(As authorized via email)

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12           IT IS SO ORDERED.

13     Dated: December 13, 2021

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15     Troy L. Nunley  
United States District Judge